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DATE FILED: 1-13-2020

By ECF

Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl St., Courtroom, 14A  
New York, New York 10007



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January 10, 2020

1. Time to respond to the Complaint  
extended to 1/31/20.

2. Conference adjourned to  
2/4/20 at 4:30 P.M.  
so ordered. per 6/6/2019 U.S.D.J.

Re: *Namel Norris v. Keste Group LLC, et al.*, Case No. 1:19-cv-07568

1/11/20

Dear Judge Koeltl:

This firm represents defendant 271 Bleecker LLC (“Bleecker”) in the above-referenced action. This is an action brought under the Americans with Disabilities Act and related state and local statutes.

I write for two reasons: (1) to request an adjournment of the Initial Pretrial Conference, scheduled for Tuesday, January 14, 2020, and (2) to obtain the Court’s approval of the 20-day extension of time for Bleecker to answer the complaint that plaintiff granted earlier today.

Based on a review of the docket in this matter, the Initial Pretrial Conference appears to have been originally scheduled for October 28, 2019. The conference then appears to have been adjourned to December 3, 2019, and then adjourned again to January 14, 2020. While this is Bleecker’s first request for an adjournment of the conference, plaintiff appears to have requested two adjournments. Counsel for co-defendant Keste Group LLC consents to the proposed adjournment.

Earlier this afternoon, I left a message with plaintiff’s counsel regarding an adjournment of the conference, and I followed up with an email. According to Daisy Hall of plaintiff’s law firm, plaintiff’s principal attorney, B. Bradley Weitz, observes the Sabbath, and thus will not be able to respond to my messages until Saturday evening, at the very earliest. Bleecker therefore makes this request now—before receiving Mr. Weitz’s response—to avoid violating the Court’s rule requiring 48 hours’ notice for all adjournment requests. This request will not affect any scheduled dates.

Bleecker’s deadline to answer the complaint in this action was September 27, 2019. Daisy Hall did not have the authority to consent to an adjournment of the conference (which only

Mr. Weitz could provide), but did consent to a twenty-day extension of Bleecker's time to answer the complaint. This is Bleecker's first request for an extension of time. This request will not affect any scheduled dates.

Accordingly, Bleecker respectfully requests: (1) that the Initial Pretrial Conference, scheduled for Tuesday, January 14, 2020 be adjourned and (2) that plaintiff's consent to an extension of time to answer be approved by the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Joshua S. Stricoff*

Joshua S. Stricoff